

**PANISH  
SHEA &  
BOYLE**  
LLP

December 15, 2020

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Doe v. Indyke, et al.*, 1:20-cv-000484-JGK-DCF  
Case Status Update – Global Settlement Reached**

Dear Judge Koeltl:

Plaintiff Jane Doe has decided to accept the offer of compensation made to her by the Epstein Victims' Compensation Program ("Program"). Pursuant to Individual Rule II.B., plaintiff is requesting a pre-motion conference on her request to dismiss this action with prejudice pursuant to Rule 41(a)(2). Since any acceptance of an offer made by the Program requires that both defendants The Estate of Jeffrey Epstein and Ghislaine Maxwell be released in the settlement agreement, plaintiff will be seeking a stipulation from these defendants to a dismissal of this action with prejudice pursuant to Rule 41(a)(1)(A)(ii) with each party to bear its own fees and costs.

Respectfully submitted,

PANISH SHEA & BOYLE

/s/ Robert Glassman

Robert Glassman